

July 27, 2005

Paul Dabbs, Chief
Statewide Planning Branch
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

Subject: Comments on Public Review Draft California Water Plan Update 2005
Volume 2, Chapter 10; Floodplain Management

Dear Mr. Dabbs,

The Santa Clara Valley Water District (District) appreciates the opportunity to submit these comments on Volume 2, Chapter 10; Floodplain Management, of the "Public Review Draft of the California Water Plan Update 2005" (Water Plan); these comments are supplemental to those submitted by the District on July 22nd.

The District is very pleased to note that this year's Water Plan includes discussions on Floodplain Management, Watershed Management, Urban Runoff Management, and many other topics beyond the traditional subject matter of the DWR Bulletin 160. The District approaches water resource issues as inter-related; a multiple-objective, multiple-disciplinary approach is the most effective strategy to address the complex and evolving challenges.

To provide context for a productive discussion on floodplain management and flood protection (Volume 2, Chapter 10), the scale of the flooding problem in California should be assessed and reported. Similar to the technical analysis that the Water Plan provides as background for the Water Supply sections, the DWR should provide quantitative information describing the magnitude of the flood risk to all Californians. The Water Plan should also report on the disturbing trends toward development in identified floodplains.

Communities statewide are at risk of flooding; the potential damages and risks to health and public safety should be a foundational component to any policy or strategy discussion. Recent levee failures have served to highlight public safety issues associated with inadequate maintenance of flood protection systems. They also demonstrate the liabilities of public agencies that provide flood protection in increasingly economically challenging times.

The District requests that the following specific, technical information on flood risks be included in the Water Plan:

1. Quantify the scale of the problem:

How much land is subject to flooding in California?

This can be measured and reported in acres, number of parcels, number of structures, miles of highway, dollars of real-estate value, or other real, tangible terms that convey the scale of the known problem – most likely, using the FEMA-mapped 1% floodplains.

2. Quantify preventive work done to date:

How effective have Federal, State and Local flood protection efforts been to date?

This can be shown by mapping those areas that have been removed from FEMA 1% floodplains in past 5 to 10 years due to flood protection projects. A count of structures or acres removed from the floodplain would be informative.

This information can be obtained by reviewing FEMA's record of "Letters of Map Change."

3. Quantify “unmapped” risk:

How many Californians are living at risk of flooding unknown to them?

Report on the areas that are protected by levees, and not in the FEMA-mapped floodplain.

Provide separate estimates for federal (or federally-certified), state, and local levee systems.

Areas protected by levees generally bear a certain level of risk; property owners may be unaware of those risks if they are not in a FEMA-mapped floodplain.

4. Report on trends:

Is the flood risk as measured by these factors increasing or decreasing over time (i.e. is the number of people living in floodplains increasing or decreasing overall? Is development outpacing flood protection works?)

5. Quantify recent flood events:

How many damaging floods occurred in the past five years in California?

What were the costs of these floods?

Where did they occur? (Provide maps)

What were the root causes? (E.g. levee failure? Dam failure? El Nino storms?)

What was the damage to health or life?

How does the cost of recent floods compare to other public safety issues? (E.g. fire, earthquakes, landslides, other natural hazards)

6. Flood Subventions

The State is in arrears by over \$80 million in flood subventions – over \$20 million for projects in Santa Clara County alone. These funds are due and payable under state law to local flood protection agencies. The State's denial to act on this legal fiscal responsibility undermines local agencies' ability to maintain constructed facilities and jeopardizes new construction of modern, multiple-objective projects. As recent State experience confirms, where levees fail, litigation usually follows. The state can invest in flood protection now, or it can pay an even greater amount in the future in the form of loss of life and property and damage to the state's economy, tax base, and general fund.

Thank you again for the opportunity to provide comments and recommendations on this year's California Water Plan. Providing a background for the scale of the flood problem in California will set the stage for policy discussions on addressing the problems and trends as they develop. If you have questions or would like to discuss these comments, please do not hesitate to contact me at (408) 265- 2607 extension 2432.

Sincerely,

Sara Duckler, P.E., CFM
Senior Engineer

Office of Watershed Planning
Santa Clara Valley Water District